

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

<b>GRANGE INSURANCE COMPANY</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	
<b>vs.</b>	:	<b>Civil Action File</b>
	:	<b>No. 4:21-CV-00147-</b>
<b>CYCLE-TEX, INC., and JARROD</b>	:	<b>AT</b>
<b>JOHNSON, individually, and on Be-</b>	:	
<b>half of a Class of persons similarly</b>	:	
<b>situated,</b>	:	
	:	
<b>Defendants.</b>	:	

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**PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff Grange Insurance Company, in accordance with Federal Rule of Civil Procedure 56, moves this Court to grant summary judgment for Plaintiff and render judgment that Plaintiff owes no duty to defend or indemnify Defendant Cycle-Tex, Inc. against the allegations and/or judgment in the underlying lawsuit styled *Jarrold Johnson, individually and on Behalf of a Class of persons similarly situated, v. Cycle-Tex, Inc., et al*, Civil Action No. 4:20-cv-0008-AT, United States District Court for the Northern District of Georgia, Rome Division.

This 21<sup>st</sup> day of June, 2022.

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*/s/ Evelyn Davis*

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Evelyn Davis  
Georgia Bar No. 801498

*Counsel for Plaintiff Grange Insurance Company*

**CERTIFICATE OF SERVICE AND  
CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1C**

This document was prepared in accordance with LR 5.1, NDGa., and LR7.1(D), NDGa. Counsel certifies that he has used 14-point Garamond as the font. I further certify that **Plaintiff's Motion for Summary Judgment** was served to all counsel of record by electronic filing:

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This 21<sup>st</sup> day of June, 2022.

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